

THE HARMAN FIRM, LLP

Attorneys & Counselors At Law

www.theharmanfirm.com

August 23, 2017

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *De La Cruz v. Trejo Liquors, Inc.* 16-cv-4382

Dear Judge Broderick:

We represent Plaintiffs Paulino De La Cruz and Juventino Ramos in the above-referenced action. On August 22, 2017, in compliance with Your Honor's August 18, 2017 Order [Docket No. 61], Plaintiffs' Counsel sent Defendant Johanny Trejo the attached to alert her of the Court's deadline to submit a case management plan and to schedule a time to meet and confer. We now write to respectfully request that Defendants' former counsel, Argilio Rodriguez, Esq. docket Defendant Johanny Trejo's home address, telephone number and email address so that the parties may communicate more easily with each other in the future.

Thank you for Your Honor's time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

Enclosure

cc: Trejo Liquors, Inc. and Johanny Trejo (via certified mail)
948 Amsterdam Avenue
New York, NY 10025

Exhibit A

THE HARMAN FIRM, LLP

Attorneys & Counselors At Law

www.theharmanfirm.com

August 22, 2017

VIA REGULAR MAIL

Johanny Trejo
Trejo Liquors Inc.
948 Amsterdam Avenue
New York, NY 10025

Re: *De la Cruz v. Trejo Liquors, Inc., 16 CV 4382*

Dear Ms. Trejo,

As you know, we represent Plaintiffs Paulino De la Cruz and Juventino Ramos in the above-referenced action. In accordance with the Court's August 18, 2017 Order, we must meet and confer and submit a proposed case management plan by September 15, 2017. Therefore, please contact us at (212) 425-2600 to schedule an in person or telephone.

Very truly yours,



Walker G. Harman, Jr.

Enclosure



Jennifer Melendez <jmelendez@theharmanfirm.com>

Activity in Case 1:16-cv-04382-VSB De La Cruz et al v. Trejo Liquors, Inc. et al Order on Motion for Conference

NYSD_ECF_Pool@nysd.uscourts.gov <NYSD_ECF_Pool@nysd.uscourts.gov>
To: CourtMail@nysd.uscourts.gov

Mon, Aug 14, 2017 at 3:22 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Southern District of New York

Notice of Electronic Filing

The following transaction was entered on 8/14/2017 at 3:22 PM EDT and filed on 8/14/2017

Case Name: De La Cruz et al v. Trejo Liquors, Inc. et al

Case Number: 1:16-cv-04382-VSB

Filer:

Document Number: 61

Docket Text:

ORDER terminating [60] Letter Motion for Conference re: [60] LETTER MOTION for Conference addressed to Judge Vernon S. Broderick from Walker G. Harman, Jr. dated August 10, 2017. Plaintiffs and the remaining individual Defendant, Ms. Trejo, are directed to meet and confer and submit a proposed case management plan by September 15. If Plaintiffs wish to seek a certificate of default against Defendant Trejo Liquors, Inc. for failure to retain counsel, (see Doc. 56), they are directed to do so by September 15 in accordance with Rule 4.H. and Attachment A of my Individual Rules. SO ORDERED. (Signed by Judge Vernon S. Broderick on 8/14/2017) (rj)

1:16-cv-04382-VSB Notice has been electronically mailed to:

Walker Green Harman, Jr. wharman@theharmanfirm.com, h.paige@theharmanfirm.com, jmelendez@theharmanfirm.com, lcraig@theharmanfirm.com

Edgar Mikel Rivera erivera@theharmanfirm.com

1:16-cv-04382-VSB Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP_dcecfStamp_ID=1008691343 [Date=8/14/2017] [FileNumber=18759332-0] [5def1ea5ee1862c7d98e0ab6eeee88552ee4aab22f7202113e9c8522a6309da3f7127a48165e392ecf59cc49b5bac58db13e3def8a36ec0804f3429e2c130f1]]